

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ALABAMA

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JBCW ENTERPRISES, LLC,	:	
SILENUS, LLC, ACS CONSULTING, INC.,	:	
and COAST DIAGNOSTICS, LLC,	:	
	:	Case No. 1:24-cv-00047
Plaintiffs,	:	
	:	
v.	:	
	:	
SONNY PATEL, individually,	:	
ALCHEME LLC,	:	
CALVIN J. CALVIN, individually,	:	
and CALVIN & ASSOCIATES, INC.,	:	
	:	
Defendants.	:	
	:	

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**MOTION FOR ENTRY OF CLERK’S DEFAULT
AGAINST ALCHEME, LLC**

Plaintiffs, JBCW Enterprises, LLC, Silenus, LLC, ACS Consulting, Inc., and Coast Diagnostics, LLC, through undersigned counsel, and pursuant to Fed. R. Civ. P. 55(a), hereby file their Motion for Entry of Clerk’s Default against Alcheme, LLC (“Alcheme”), and state:

1. As evidenced by the Proof of Service filed in this action as to Alcheme (*see* Dkt. 18), on March 1, 2024 Alcheme was served with the (a) Summons, (b) Complaint, (b) Notice of Filing Redacted Complaint Exhibits A, B, and I, and (d) Notice of Filing Unredacted Complaint Exhibits C and D. *See* **Ex. “A”**, Proof of Service.

2. Accordingly, Alcheme’s response to the Complaint was due on or before March 22, 2024.

3. As of the date hereof, Alcheme has neither appeared in this action nor filed an Answer or response to the Complaint.

4. Fed. R. Civ. P. 55(a) states: “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default.” (emphasis added).

WHEREFORE, Plaintiffs, JBCW Enterprises, LLC, Silenus, LLC, ACS Consulting, Inc., and Coast Diagnostics, LLC respectfully request that a clerk’s default be entered against Defendant, Alcheme, LLC pursuant to Rule 55(a).

Respectfully submitted,

/s Brian E. Dickerson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3rd day of April, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record in this action.

By: /s/ Brian E. Dickerson
Brian E. Dickerson

Defendants to be served as follows:

Alchemie LLC
c/o Legalinc Corporate Services, Inc.
Registered Agent
651 N. Broad Street, Suite 201
Middletown, DE 19709

Calvin & Associates, Inc.
626 Wilshire Boulevard, Suite 410
Los Angeles, CA 90017

Sonny Patel
16270 Cadmium Ct.
Chino Hills, CA 91709

Calvin J. Calvin
626 Wilshire Boulevard, Suite 410
Los Angeles, CA 90017